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U S DISTRICT COURT E.D.N.Y.

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF NEW YORK

★ MAY 13 2005 ★

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Michael J. Wang, M.D.

Plaintiff,

LONG ISLAND OFFICE

-Against-

CV 05-1861
(JS) (ARL)

United States Medical License
Examination Secretariat,

Defendant,
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PLAINTIFF PROPOSED VOIR DIRE

Introduction of the Case

Dr. Wang is a physician of Asian descent, born in People's Republic of China. Defendant discriminated against him on basis of his race and/or national origin including defames him and deprived Dr. Wang's privilege of being a citizen of the United States. This action seeks compensatory and punitive damages for defendant's violations of the United States Constitution, The New York Constitution, Federal and New York State anti-discriminatory statutes as well as claims arising under New York common law. The jury in this case will be asked to combine all the evidence in consideration of the law as it comes from the Court and reach a reasonable, truthful, and proper verdict as to the guilt or innocence the defendants on trial. In addition to all the considerations of fairness and objective judgment which the jury is asked to render.

Voir Dire Questions

Plaintiff respectfully request the Court read the statement of the case to the jury panel and ask the proposed following voir dire questions:

1. What is your occupation?
2. Who is your employer?
3. What is your title or position?
4. What is your educational background?

5. What is your race and national origin?
6. How do you feel about people of Asian descent living in the United States?
7. In general, do you think our society treats people of all races equally? (please explain)
8. What effects do you think racial or other forms of discrimination have on people who are the targets of the discrimination?
9. What is your attitude toward to Asian American?
10. Do you have experience of discrimination against on the basis of your race, national origin, skin color?
11. Do you have experience of your employer mistreat you for example because your race, national origin?
12. Do you have experience job-related problem? Your employer is treating you fairly or legally?
13. Do you have experience of adverse employment action such as demotion, termination, disadvantageous transfers to assignments, refusals to promote, unwarranted negative job evaluation, and intoleration of harassment by other employee?
14. Have you ever been a victim of discrimination?
15. Do you have any biases against people of different ethic backgrounds than your own?
16. Do you really believe everyone deserve equal opportunity in employment?
17. Do you have experience of retaliation from your employer because you complaint about such discriminatory treatment?
18. What is your attitude toward to employer retaliation because you compalin about discrimination?
19. Do you have experience of you former employer interfere with your efforts for new employment after leaving a job?
20. Do you have experience that employer denied the credit of your job performance which you deserve?
21. Do you have an experience of emotional distress after you have been fired by your employer? What kind of emotional distress do you experience?

22. Do you have experience that your employer defames you?
23. What is your attitude toward to defamation?
24. If you employer defame you and what would you do?
25. Do you believe that we all deserve equal privilege and equal protection right?
26. Do you have experience of mistreated by Stony Brook University Hospital?
27. Do you have experience of former employer who treats you in discriminatory fashion?
28. Do you know that you complain about discrimination that is federal and state protected activity?
29. Have you been experiment terminated from your job and suffering, pain, and humiliation?
30. Why is it important to compensate some one for pain, mental anguish, humiliation, emotional distress, and suffering?
31. How do you feel about punitive damages? Why?
32. Do you belied you could award punitive damages if given instructions that effect by the Court and if the evidence so warrants such an award?
33. Is there anything about this case that might cause you to start out the case favoring one side or the other?
34. Have you ever been seating as a jury in an employment discrimination case?
35. If you are selected to sit as a juror, will you be able and will to render a verdict solely on the evidence present at the trial and the law?

Dated: May 11, 2005

cc. Michael J. Puma Esq.
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Philadelphia, PA 19103-2921

Respectfully submitted



Michael J. Wang, MD